

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| IN RE: Shanyel Little Marcus A. Little | BK NO. 20-11291 MDC |
| Debtor(s) | Chapter 13 |
| MIDFIRST BANK | Hearing Date: 06/04/20 |
| Movant | |
| vs. | |
| Shanyel Little Marcus A. Little | |
| Respondent(s) | |

**OBJECTION OF MIDFIRST BANK
TO CONFIRMATION OF CHAPTER 13 PLAN**

MIDFIRST BANK (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On May 11, 2020, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$17,000.00.
2. Debtor's Plan provides for payment in the amount of \$20,467.94 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$3,467.94, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
- 6.

WHEREFORE, the Secured Creditor, MIDFIRST BANK, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: July 1, 2020

By: **/s/ Rebecca A. Solarz, Esquire**
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